BEFORE THE POSTAL RATE COMMISSION WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Docket No. C2001-1

Complaint on Sunday and Holiday Collections

DAVID B. POPKIN INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE [DBP/USPS-13-17] AND POTENTIAL MOTION FOR LATE ACCEPTANCE

June 19, 2001

Pursuant to POR C2001-1/1, I hereby submit interrogatories to the United States Postal Service. The instructions contained in my interrogatories DBP/USPS-1-12 dated May 29, 2001, are incorporated herein by reference. These interrogatories are being mailed on June 19, 2001 and should arrive at the Commission on June 21, 2001, under current USPS standards. In the event that they do not arrive by the June 22, 2001, deadline, I move for late acceptance.

Respectfully submitted

June 19, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-13 Please refer to USPS-LR-2/C2001-1, [a] Confirm that the use of the entry "NR" indicates that the facility in question did not report for that date. [b] Confirm that an entry of "NR" could indicate that the facility in question did process mail on that date but did not report the data. [c] Confirm that the Postal Service has a practice where one facility will send its mail on a regular or irregular basis, such as on a Saturday or a holiday, to another facility in the area to process. [d] Confirm that the practice referred to in subpart c may also take place on an emergency basis such as recently occurred in the Houston area due to flooding. [e] Confirm that a facility that forwards its mail as noted in subparts b and c would then report 0.000 for its own facility. [f] Confirm that the mailers in the area covered by a facility which forwards its mail as noted in subparts b and c will still receive service on the day in question as if their own facility processed the mail rather than forwarding it. [g] Please provide a

revised library reference USPS-LR-2/C2001-1 that utilizes a code, such as "FWD", to indicate those instances where the mail was forwarded to another facility to process. [h] Please explain any subparts that you are not able to confirm.

DBP/USPS-14 Please refer to your response to DBP/USPS-1a. [a] Please confirm that the Postal Operations Manual is available to members of the general public. [b] Please confirm that members of the general public may properly assume that the policies, regulations, and procedures of the Postal Service that are contained in the POM will be complied with by the Postal Service. [c] Please explain any subparts that you are not able to confirm.

DBP/USPS-15 Please refer to your response to DBP/USPS-6. Explain why there are no plans to revise the provisions of the DMM as they relate to Sunday and holiday service.

DBP/USPS-16 Please refer to your response to R2000-1 Interrogatory DBP/USPS-67c. Confirm, or explain if you are unable to do so, that the POM requirement for exceptions to the level of service requiring approval by the Chief Operating Officer and Executive Vice President is still the controlling regulation when compared to the similar DMM provision which allows approval of exceptions by a District Manager.

DBP/USPS-17 Please refer to Library References USPS-LR-1/C2001-1 and USPS-LR-3/C2001-1 and to the responses to Interrogatories DFC/USPS-1-18. These documents contain various letters, memoranda, and other documents in which partial redactions of the document appear to have been performed on at least one of the documents. Please either confirm that no redactions have been performed, provide unredacted documents in the cases where redaction was performed, or provide a listing of those documents which have had information redacted and the location of the redaction, the type of information that was redacted, and the reason for such redaction. This also refers to any redaction that may have taken place with respect to complete pages of the document or its attachments.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

June 19, 2001

David B. Popkin